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Counsel for Plaintiff

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MARK YOUNG,

Plaintiff,

v.

SOLANA LABS, INC., et al.,

Defendants.

Case No. 3:22-cv-03912-RFL

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE FOR
AMENDED COMPLAINT AND CASE
CAPTION**

1 Lead Plaintiff Mark Young (“Lead Plaintiff”) and Defendants Solana Labs, Inc., Multicoi
2 Capital Management LLC, and Kyle Samani (collectively “Defendants”)¹ (“Lead Plaintiff” and
3 “Defendants” are collectively referred to herein as the “Parties”) hereby stipulate as follows:

4 **WHEREAS**, on July 1, 2022, Lead Plaintiff filed a complaint captioned Mark Young, on
5 behalf of himself and all others similarly situated, v. Solana Labs, Inc., The Solana Foundation,
6 Anatoly Yakovenko, Multicoi Capital Management LLC, Kyle Samani, and FalconX LLC in the
7 above-captioned case alleging violations of the Securities Act of 1933 and the California
8 Corporations Code (the “Complaint”) against Defendants;

9 **WHEREAS**, on September 6, 2022, Lead Plaintiff filed a Motion to Appoint Lead Plaintiff
10 and Lead Counsel (Dkt. No. 29);

11 **WHEREAS**, the Court previously issued an order, at the joint request of the Parties, to
12 continue the initial case management conference and vacate all associated deadlines pending the
13 appointment of lead plaintiff and lead counsel (Dkt. No. 40);

14 **WHEREAS**, by Order dated November 13, 2023, the Court granted Lead Plaintiff’s motion
15 for appointment as Lead Plaintiff in this securities class action litigation involving Solana Labs, Inc.,
16 and appointed its counsel as Lead Counsel (Dkt. No. 59);

17 **WHEREAS**, by Order dated November 13, 2023, the Court directed Lead Plaintiff to file
18 his (first) amended complaint by January 12, 2024 (Dkt. No. 59);

19 **WHEREAS**, the Parties met and conferred regarding a briefing schedule for Defendants’
20 Motion to Dismiss.

21 **WHEREAS**, Defendants shall move to dismiss the amended complaint on or before March
22 12, 2024, with the motion noticed for hearing on a date to be set by the Court consistent with this
23 briefing schedule;

24 **WHEREAS**, Lead Plaintiff shall file its opposition to the motion to dismiss on or before
25 April 11, 2024; and

26 **WHEREAS**, Defendants shall file their reply in support of their motion to dismiss on or

27 ¹ The Solana Foundation (“Foundation”), Anatoly Yakovenko (“Yakovenko”), and FalconX LLC
28 (“FalconX”) have not been served and have not appeared in this case.

1 before May 13, 2023.

2
3 Dated: December 20, 2023

Respectfully submitted,

/s/ Matthew S. Weiler

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1 Dated December 20, 2023

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13 *Attorneys for Defendant Solana Labs, Inc.*

16 Dated December 20, 2023

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24 *Attorneys for Multicoïn Capital Management LLC*
25 *And Kyle Samani*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Honorable Rita F. Lin
United States District Court Judge